

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION

DOUG HUMPHREY and)
RICHARD DRAKE HUMPHREY,)
Plaintiffs,)
vs.) Case No.: 3:18-CV-05016-BP
JASPER COUNTY, MISSOURI, et al.,)
Defendants.)

JOINT MOTION FOR PROTECTIVE ORDER

COME NOW the parties, by and through their undersigned and respective attorneys of record, and pursuant to Fed. R. Civ. P. 26(c)(2) and (7) move this Court for issuance of a Protective Order providing for discovery of confidential records and other sensitive information only on specified terms and conditions, and restricting use and dissemination of such records or information secured through formal or informal discovery in this case. As grounds for their Motion, the parties jointly state to the Court as follows:

1. This is a civil lawsuit involving allegations made by Plaintiffs that their constitutional rights were denied by Defendants.
2. The parties anticipate they will exchange information and take depositions concerning personnel records of parties and possibly non-parties, juvenile records, medical records, police reports, and internal policies and procedures of law enforcement agencies.
3. The production of these documents and tangible things, and the taking of depositions, will be impaired and hindered by the lack of an appropriate Protective Order controlling the use, dissemination and disclosure of these materials and information.

4. Realizing that a Protective Order would be beneficial to the parties and the discovery process, the parties have conferred and reached an agreement with regard to an appropriate Protective Order concerning these documents and information. The parties' proposed Protective Order will be electronically submitted in Word format to the Court.

5. Pursuant to Fed. R. Civ. P. 26, this Court has the authority to issue the requested Protective Order.

WHEREFORE, based upon the above and foregoing, the parties jointly respectfully move this Court to enter a Protective Order in the form submitted electronically to the Court, together with such other and further relief as this Court deems just and appropriate.

Respectfully submitted,

/s/ Jason Coatney
Jason Coatney
THE LAW OFFICE OF JASON COATNEY, LLC
939 Boonville, Suite C
Springfield, MO 65802
Attorneys for Plaintiffs

/s/ David S. Baker
David S. Baker #30347
Fisher, Patterson, Sayler & Smith, LLP
9229 Ward Parkway, Suite 370
Kansas City, MO 64114
816-523-4667, Ext. 121; Fax: 816-523-5667
dbaker@fisherpatterson.com
Attorneys for Defendants Webb City, Smith and Sjorlund